

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In re:

BLOCKFI INC., *et al.*,
Debtors.¹

Chapter 11
Case No. 22-19361 (MBK)
(Jointly Administered)

**NOTICE OF MOTION TO FILE UNDER SEAL EXHIBIT A
TO THE CERTIFICATION OF DAVID E. SKLAR IN SUPPORT OF**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

**THE MOTION OF ZACHARY PRINCE AND FLORI MARQUEZ
FOR AN ORDER LIFTING THE AUTOMATIC STAY, TO THE EXTENT
APPLICABLE, TO ALLOW INSURED PERSONS TO ACCESS PRIMARY
DIRECTORS AND OFFICERS INSURANCE POLICY FOR DEFENSE COSTS**

PLEASE TAKE NOTICE that on September 21, 2023 at 10:00 a.m. (ET) (the “Hearing”) or as soon thereafter as counsel may be heard, Zachary Prince and Flori Marquez (together, the “Movants”), by and through their counsel, shall move the motion to seal (the “Motion to Seal”) before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the *Relm Insurance, Ltd. Director and Officer Policy* (the “Relm” and the insurance policy, the “Relm D&O Policy”), filed substantially contemporaneously herewith, and (B) granting the Movants such other and further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that the Motion to Seal sets forth the relevant factual bases upon which the relief requested should be granted. A proposed order granting the relief requested in the Motion to Seal is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion to Seal shall: (i) be in writing, (ii) state with particularity the basis of the objection; (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of

March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received on or before **September 14, 2023**.

PLEASE TAKE FURTHER NOTICE that only those responses or objections that are timely filed, served, and received will be considered at the Hearing. Failure to file a timely objection may results in entry of a final order granting the Motion to Seal as requested by the Movants.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion to Seal shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d) and the relief requested may be granted without further notice or hearing.

Dated: August 22, 2023

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